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Case 2:10-cv-10978-PJD-MJH

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UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

Defendants Response to Plaintiff's Second Motion to Adjourn Scheduling Order
Dates

Defendants Response to Plaintiff's Second Motion to Adjourn Scheduling Order Dates

The Plaintiff is again proving the fact that they have no evidence to support their frivolous Claims.

If the Plaintiff had evidence to support their claims one would expect them to expedite this case. Instead the Plaintiff consistently asks for adjournment without logic, proving lack of merit and substance to support their Claims.

The Plaintiff is again burdening the Court and the Defendant.

1) The Plaintiff acted in Bad Faith when they filed Docket 13, Request for Clerks Entry of Default, being fully aware the Defendant did answer the Plaintiff's Docket 1 Claims in Docket 10. The Plaintiff was also fully aware the Defendant traveled from abroad to defend themselves against the Plaintiff's Claims. The Court proved the Plaintiff acted in Bad Faith by setting-aside the entry of Default.

2) The Plaintiff acted in Bad Faith by deleting and/or altering evidence prior to trial as shown in Docket 51 violating LR 83.22(a)(3) Attorney Discipline and 18 U.S.C. 1506 Alteration of Record.

3) The Plaintiff acted in Bad Faith regarding depositions. The Plaintiff demanded deposition on dates of which the Defendant could not attend as demonstrated in Docket 51 and Docket 56.

4) The Plaintiff filed the Motion to Compel wrongfully and with bad intent.

5) This motion was referred to Magistrate Judge Michael Hluchaniuk. The Defendant has filed Motions for Sanctions and Dismissal, and Motions for Protective Order to prevent the Plaintiff from gaining access to evidence of which they can alter and/or delete as they have a history of doing.

6) Magistrate Judge Michael Hluchaniuk entered a scheduling order relative to Plaintiff's motion.

7) As part of this order, the Court will not hear argument on this motion until December 22, 2010.

8) If the Plaintiff had evidence to support their claims one would expect them to want to expedite this case. Instead the Plaintiff consistently asks for adjournment which is illogical.

9) The Plaintiff is requesting discovery in Bad Faith as demonstrated in Docket 51 which demonstrates deletion and/or altering of evidence.

10) The Plaintiff is requesting discovery in Bad Faith as demonstrated in Docket 51 which demonstrates deletion and/or altering of evidence.

11) The Plaintiff is requesting discovery in Bad Faith as demonstrated in Docket 51 which demonstrates deletion and/or altering of evidence.

12) The Plaintiff does not have good cause and has acted in Bad Faith.

13) The Plaintiff does not have good cause and has acted in Bad Faith.

14) The Defendant asks the Court to deny this request in that it causes undue burden on the Defendant and the Court. The Plaintiff has consistently tried to delay this trial and proceedings.

15) If the Plaintiff had evidence to substantiate their Claims they would not need substantial discovery.

The Defendant does not need substantial discovery time and would like to expedite this case and stop wasting Court resources.

A handwritten signature in black ink, appearing to read "H. Ward", with a large, sweeping flourish extending to the right.